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 Richmond Police Department

FILED

JUN 9 - 2006

RICHARD W. WIEKING
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND

RECEIVED

UNITED STATES DISTRICT COURT

JUN - 8 2006

NORTHERN DISTRICT OF CALIFORNIA

RICHARD W. WIEKING
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND

OAKLAND DIVISION

UNITED STATES,

Case No. ~~CR-00075~~ CW

Plaintiff,

**CITY OF RICHMOND'S REQUEST FOR
 ADDITIONAL TIME TO SUBMIT
 RESPONSE TO COURT'S ORDER
 SETTING BRIEFING SCHEDULE
 DATED MAY 22, 2006**

vs.

WILLIAM JOSEPH FOOTE,

Defendant.

Date: June 9, 2006

Judge: Magistrate Judge Wayne D. Brazil

CITY OF RICHMOND, RICHMOND
 POLICE DEPARTMENT,

Real Parties in Interest.

On May 22, 2006, the Court issued an Order granting the City of Richmond ("City") until **June 9, 2006** to file a motion to quash the subpoena for confidential personnel records issued by the Court on May 12, 2006 or, in the alternative to file a motion for a protective order concerning use of those records by the defendant William Joseph Foote ("Defendant").

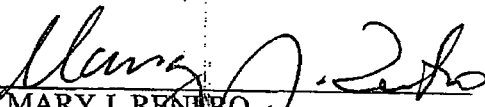
Counsel for the City and for the Defendant are negotiating a stipulated agreement regarding Court review and disclosure of the subject records and a protective order. The City anticipates that agreement shall be reached no later than June 9, 2006, and requests an extension until **June 14, 2006** to file either a stipulation signed by Counsel for the City and for the

STIPULATED REVIEW, DISCLOSURE AND PROTECTIVE ORDER

cc: WDB's staff, Copy to parties via ECF,
 Copy mailed to
 Asst. City Atty. Mary J. Renfro,
 Sherah

1 Defendant or, if necessary, either a motion to quash or a motion for a protective order.


2 DATED: June 7, 2006

3 By: 
4 MARY J. RENTERIA
5 Attorney for CITY OF RICHMOND

6 FOR GOOD CAUSE SHOWN, the Court's Order Setting Briefing Schedule dated May 22,
7 2006 is modified as follows: The Richmond City Attorney shall have until June 14, 2006 to file
8 a motion to quash subpoena or motion for protective order relating to the personnel records
9 requested in the subpoena.

10 IT IS SO ORDERED.

11 DATED: 6-9-06

12 
13 Hon. Wayne D. Brazil
14 United States District Court, Magistrate Judge

PROOF OF SERVICE**(Code Civ. Proc., §§ 1012, 1013a, 2015.5; Fed. Rules Civ. Proc., Rule 5(b).)**

Re: United States v. William Joseph Foote
City of Richmond, Richmond Police Dept., Real Parties in Interest

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is City Hall, 1401 Marina Way South, Richmond, California. On June 8, 2006, I served the following document(s) by the method indicated below.

**CITY OF RICHMOND'S REQUEST FOR ADDITIONAL TIME TO
SUBMIT RESPONSE TO COURT'S ORDER SETTING BRIEFING
SCHEDULE DATED MAY 22, 2006**

☐ By transmitting via facsimile on this date from fax number (510) 620-6518 the document(s) listed above to the fax number(s) set forth below. The transmission was completed before 5:00 p.m. and was reported complete and without error. The transmission report, which is attached to this proof of service, was properly issued by the transmitting fax machine. Service by fax was made by agreement of the parties, confirming in writing. The transmitting fax machine complies with Cal.R.Ct.2003(3).

☒ By placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Richmond, California addresses as set forth below. There is delivery service by United States mail at the place so addressed, or regular communication by United States mail between the place of mailing and the place so addressed.

Ismail Ramsey, Esq. Ramsey & Ehrlich LLP 803 Hearst Avenue Berkeley, CA 94710	Satish Jallepalli, Esq. Special Assistant United States Attorney 1301 Clay Street, Suite 340-S Oakland, CA 94612
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I declare under penalty of perjury under the laws of the State of California and the United States of America that the above is true and correct. Executed on June 8, 2006, at Richmond, California.


MARCIA BROWN-SCURRY

PROOF OF SERVICE